

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Evangelina Forsberg, :
: :
Plaintiff, :
: :
v. : CIVIL ACTION NO.
: 1:07-cv-03116-JOF-RGV
James Pefanis, et al., :
: :
Defendants. :
: :

VERDICT

WE, THE JURY, FIND:

Assault and Battery

1. With respect to the finding that Defendant Pefanis, AME Financial Corporation, and Georgia Mutual Mortgage Corporation engaged in assault and battery against the Plaintiff, what sum of money do you find from a preponderance of the evidence to be the total amount of the Plaintiff's damages?
 - (a) Mental or physical pain and anguish, past and future \$ 1,000,000
 - (b) What portion of that amount, if any, should be apportioned to each Defendant:

\$ 500,000 Pefanis

\$ 250,000 AME Financial Corporation

\$ 250,000 Georgia Mutual Mortgage Corporation

\$ 1,000,000 TOTAL (your total should match line 1(a) above)

Assault and battery (con't)

2. (a) Punitive damages \$ 1,000,000

If you awarded no punitive damages, proceed to Question # 3.

What portion of that amount, if any, should be apportioned to each Defendant:

\$ 500,000 Pefanis

\$ 250,000 AME Financial Corporation

\$ 250,000 Georgia Mutual Mortgage Corporation

\$ 1,000,000 TOTAL (your total should match line 2(a) above)

(b) (i) Do you find that Defendant Pefanis acted with specific intent to harm?

Yes X

No _____

(ii) Do you find that Defendant AME Financial Corporation acted with specific intent to harm?

Yes X

No _____

(iii) Do you find that Defendant Georgia Mutual Mortgage Corporation acted with specific intent to harm?

Yes X

No _____

False Imprisonment

3. With respect to the finding that Defendant Pefanis, AME Financial Corporation, and Georgia Mutual Mortgage Corporation engaged in false imprisonment against the Plaintiff, what sum of money do you find from a preponderance of the evidence to be the total amount of the Plaintiff's damages?

Any damages you award on a claim must be supported by evidence relating to that claim and damages for one claim may not be duplicative of damages awarded in another claim. Plaintiff may not recover twice for the same injury under alternate theories of liability. A party is entitled to be made whole, but not entitled to recover more than once for the same injury. If you believe you have already awarded Plaintiff all damages that would cover the conduct of this cause of action, proceed to Question # 5.

(a) Mental or physical pain and anguish,
past and future \$ 0

(b) What portion of that amount, if any, should be apportioned to each
Defendant:

\$ 0 Pefanis

\$ 0 AME Financial Corporation

\$ 0 Georgia Mutual Mortgage Corporation

\$ 0 TOTAL (your total should match line 3(a)
above)

False Imprisonment (con't)

4. (a) Punitive damages \$ 0

If you awarded no punitive damages, proceed to Question # 5.

What portion of that amount, if any, should be apportioned to each Defendant:

\$ 0 Pefanis

\$ 0 AME Financial Corporation

\$ 0 Georgia Mutual Mortgage Corporation

\$ 0 TOTAL (your total should match line 4(a) above)

(b) (i) Do you find that Defendant Pefanis acted with specific intent to harm?

Yes X

No _____

(ii) Do you find that Defendant AME Financial Corporation acted with specific intent to harm?

Yes X

No _____

(iii) Do you find that Defendant Georgia Mutual Mortgage Corporation acted with specific intent to harm?

Yes X

No _____

Invasion of Privacy

5. With respect to the finding that Defendant Pefanis, AME Financial Corporation, and Georgia Mutual Mortgage Corporation engaged in an invasion of privacy against the Plaintiff, what sum of money do you find from a preponderance of the evidence to be the total amount of the Plaintiff's damages?

Any damages you award on a claim must be supported by evidence relating to that claim and damages for one claim may not be duplicative of damages awarded in another claim. Plaintiff may not recover twice for the same injury under alternate theories of liability. A party is entitled to be made whole, but not entitled to recover more than once for the same injury. If you believe you have already awarded Plaintiff all damages that would cover the conduct of this cause of action, proceed to Question # 7.

(a) Mental or physical pain and anguish,
past and future \$ 0

(b) What portion of that amount, if any, should be apportioned to each Defendant:

\$ 0 Pefanis

\$ 0 AME Financial Corporation

Georgia Mutual Mortgage Corporation

\$ 0 TOTAL (your total should match line 5(a) above)

Invasion of Privacy (con't)

6. (a) Punitive damages \$ 0

If you awarded no punitive damages, proceed to Question # 7.

What portion of that amount, if any, should be apportioned to each Defendant:

\$ 0 Pefanis

\$ 0 AME Financial Corporation

\$ 0 Georgia Mutual Mortgage Corporation

\$ 0 TOTAL (your total should match line 6(a) above)

(b) (i) Do you find that Defendant Pefanis acted with specific intent to harm?

Yes X

No _____

(ii) Do you find that Defendant AME Financial Corporation acted with specific intent to harm?

Yes X

No _____

(iii) Do you find that Defendant Georgia Mutual Mortgage Corporation acted with specific intent to harm?

Yes X

No _____

Negligent Retention

7. With respect to the finding that Defendants AME Financial Corporation and Georgia Mutual Mortgage Company negligently retained Defendant Pefanis, what sum of money do you find from a preponderance of the evidence to be the total amount of the Plaintiff's damages?

Any damages you award on a claim must be supported by evidence relating to that claim and damages for one claim may not be duplicative of damages awarded in another claim. Plaintiff may not recover twice for the same injury under alternate theories of liability. A party is entitled to be made whole, but not entitled to recover more than once for the same injury. If you believe you have already awarded Plaintiff all damages that would cover the conduct of this cause of action, proceed to Question # 9.

(a) Mental or physical pain and anguish,
past and future \$ 100,000

(b) What portion of that amount, if any, should be apportioned to each Defendant:

\$ 50,000 AME Financial Corporation

\$ 50,000 Georgia Mutual Mortgage Corporation

\$ 100,000 TOTAL (your total should match line 7(a) above)

Negligent Retention (con't)

8. (a) Punitive damages \$ 3,000,000

If you awarded no punitive damages, proceed to Question # 9.

What portion of that amount, if any, should be apportioned to each Defendant:

\$ 2,000,000 AME Financial Corporation

\$ 1,000,000 Georgia Mutual Mortgage Corporation

\$ 3,000,000 TOTAL (your total should match line 8(a) above)

(b) (i) Do you find that Defendant AME Financial Corporation acted with specific intent to harm?

Yes X

No _____

(ii) Do you find that Defendant Georgia Mutual Mortgage Corporation acted with specific intent to harm?

Yes X

No _____

Sexual Harassment in Violation of Title VII

9. With respect to the finding of Defendant AME Financial Corporation's and Defendant Georgia Mutual Mortgage Company's violation of Title VII arising out of the sexual harassment of Plaintiff by Defendant Pefanis, what sum of money do you find from a preponderance of the evidence to be the total amount of the Plaintiff's damages?

Any damages you award on a claim must be supported by evidence relating to that claim and damages for one claim may not be duplicative of damages awarded in another claim. Plaintiff may not recover twice for the same injury under alternate theories of liability. A party is entitled to be made whole, but not entitled to recover more than once for the same injury. If you believe you have already awarded Plaintiff all damages that would cover the conduct of this cause of action, proceed to Question # 11.

(a) Mental or physical pain and anguish,
past and future \$ 50,000

(b) What portion of that amount, if any, should be apportioned to each
Defendant:

\$ 25,000 AME Financial Corporation

\$ 25,000 Georgia Mutual Mortgage Corporation

\$ 50,000 TOTAL (your total should match line 9(a)
above)

Sexual Harassment in Violation of Title VII (con't)

10. Punitive damages \$ 1,000,000

If you awarded no punitive damages, proceed to Question # 11.

What portion of that amount, if any, should be apportioned to each Defendant:

\$ 500,000 AME Financial Corporation

\$ 500,000 Georgia Mutual Mortgage Corporation

\$ 1,000,000 TOTAL (your total should match line 10.
above)

Retaliation in Violation of Title VII

11. With respect to the finding of Defendant AME Financial Corporation's and Georgia Mutual Mortgage Company's violation of Title VII arising out of Defendant Pefanis' retaliation against the Plaintiff, what sum of money do you find from a preponderance of the evidence to be the total amount of the Plaintiff's damages?

Any damages you award on a claim must be supported by evidence relating to that claim and damages for one claim may not be duplicative of damages awarded in another claim. Plaintiff may not recover twice for the same injury under alternate theories of liability. A party is entitled to be made whole, but not entitled to recover more than once for the same injury. If you believe you have already awarded Plaintiff all damages that would cover the conduct of this cause of action, proceed to Question # 13.

(a) Mental or physical pain and anguish,
past and future \$ 500,000

(b) What portion of that amount, if any, should be apportioned to each
Defendant:

\$ 250,000 AME Financial Corporation

\$ 250,000 Georgia Mutual Mortgage Corporation

\$ 500,000 TOTAL (your total should match line 11(a)
above)

Retaliation in Violation of Title VII (con't)

12. Punitive damages \$ 2,000,000

If you awarded no punitive damages, proceed to Question # 13.

What portion of that amount, if any, should be apportioned to each Defendant:

\$ 1,000,000 AME Financial Corporation

\$ 1,000,000 Georgia Mutual Mortgage Corporation

\$ 2,000,000 TOTAL (your total should match line 12. above)

Threats and Intimidation in Violation of Section 1985(2)

13. With respect to the finding that Defendants AME Financial Corporation, Georgia Mutual Mortgage Company and Defendant Pefanis conspired to threaten and intimidate the Plaintiff in violation of Section 1985(2), what sum of money do you find from a preponderance of the evidence to be the total amount of the Plaintiff's damages?

Any damages you award on a claim must be supported by evidence relating to that claim and damages for one claim may not be duplicative of damages awarded in another claim. Plaintiff may not recover twice for the same injury under alternate theories of liability. A party is entitled to be made whole, but not entitled to recover more than once for the same injury. If you believe you have already awarded Plaintiff all damages that would cover the conduct of this cause of action, proceed to Question # 15.

(a) Mental or physical pain and anguish,
past and future \$ 0

(b) What portion of that amount, if any, should be apportioned to each
Defendant:

\$ 0 Pefanis

\$ 0 AME Financial Corporation

\$ 0 Georgia Mutual Mortgage Corporation

\$ 0 TOTAL (your total should match line 13(a)
above)

Threats and Intimidation in Violation of Section 1985(2) (con't)

14. Punitive damages \$ 500,000

If you awarded no punitive damages, proceed to Question # 15.

What portion of that amount, if any, should be apportioned to each Defendant:

\$ 200,000 Pefanis

\$ 150,000 AME Financial Corporation

\$ 150,000 Georgia Mutual Mortgage Corporation

\$ 500,000 TOTAL (your total should match line 14.
above)

Net Lost Wages and Benefits

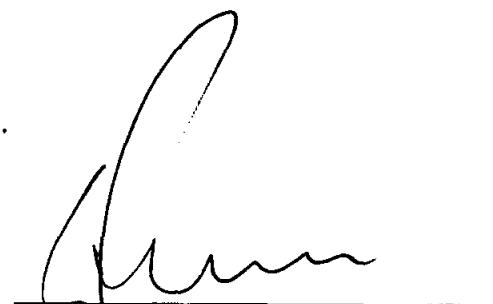
15. What sum of money do you find from a preponderance of the evidence to be the total amount of the Plaintiff's lost wages and benefits damages?

Net lost wages and benefits
to the date of trial \$ 50,000

For which causes of action do you award net lost wages and benefits?

| | |
|------------------------|--|
| a) Assault and battery | e) Sexual Harassment in Violation of Title VII |
| Yes <u>X</u> | Yes <u>X</u> |
| No _____ | No _____ |
| b) False imprisonment | f) Retaliation in Violation of Title VII |
| Yes _____ | Yes <u>X</u> |
| No <u>X</u> _____ | No _____ |
| c) Invasion of Privacy | g) Threats and Intimidation in Violation of Section 1985(2) |
| Yes _____ | Yes <u>X</u> |
| No <u>X</u> _____ | No _____ |
| d) Negligent Retention | |
| Yes <u>X</u> | |
| No _____ | |

This, the 16th day of October 2009.



FOREPERSON
William C. Powell